

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA

DENEISE INGRAM, as Legal Guardian)	CASE NO. 8:09-cv-110
for KAREN CHANDLER,)	
)	
Plaintiff,)	
)	MOTION TO DISMISS
v.)	DEFENDANT COVENANT CARE, INC.
)	
COVENANT CARE MIDWEST, INC.,)	
d/b/a NEBRASKA SKILLED NURSING)	
AND REHABILITATION, and)	
COVENANT CARE, INC.)	
)	
Defendant.)	

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW the Plaintiff, and moves this Court for an Order dismissing defendant Covenant Care, Inc. as a party to this action.

In support of this Motion, Plaintiff would show that discovery has revealed that liability rests solely with the remaining Defendant, Covenant Care Midwest, Inc., d/b/a Nebraska Skilled Nursing and Rehabilitation. Further, that the undersigned has conferred with opposing counsel, who has no objection to the filing of same.

WHEREFORE, Plaintiff prays that this Motion be granted and sustained by appropriate Order of this Honorable Court.

DATED this 10th day of September, 2010.

DENEISE INGRAM, as Legal Guardian for
KAREN CHANDLER, Plaintiff

By s/ Matthew G. Miller
Matthew G. Miller, #19092
6910 Pacific Street, Suite 200
Omaha, Nebraska 68106
(402) 558-4900
(402) 558-4906 (Facsimile)
matt@mymillerlaw.com
ATTORNEY FOR PLAINTIFF

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 10th day of September, 2010, I electronically filed and the foregoing document with the Clerk of the Court by using the CM/ECF system which sent notification of such filing upon all parties who filed an appearance or motion by electronic filing in this case to the following:

Jack D. Williams
Robert M. Slovek
Heather H. Anschutz
Kutak Rock, LLP, Omaha
The Omaha Building
1650 Farnam St.
Omaha, NE 68102-2186
Phone: (402) 346-6000
Fax: (402) 346-1148
E-Mail: jack.williams@kutakrock.com; robert.slovek@kutakrock.com,
heather.anchutz@kutakrock.com; barbara.brown@kutakrock.com,
lea.coffman@kutakrock.com

Admitted Pro Hac Vice
Alexander F. Giovanniello, #125562
Karen A. Bocker, #213764
Giovanniello & Michels, LLP
One Pointe Drive, Suite 300
Brea, CA 92821
E-Mail: afg@gm-lawfirm.com; klk@gm-lawfirm.com; kab@gm-lawfirm.com;

By s/ Matthew G. Miller